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MEMORANDUM

TO: Cecilia Tapia, Director, SUPR

FROM: James A. Johnson, OSC SUPR/ERNB

THRU: Dan Gravatt, RPM SUPR/MOKS

DATE: Friday, November 8, 2013

RE: Trip report, October 27 – November 9, 2013

Site: Westlake Landfill Site
Address: 13570 St. Charles Rock Road
Bridgeton, MO 63044
CERCLIS ID: MOD079900932
SSID: 0714

On Sunday, October 27, 2013, at the request of the EPA R7 Remedial Project Manager (RPM) Dan Gravatt, On-scene Coordinator (OSC) James Johnson traveled to Bridgeton, Missouri to attend the Feezor Engineering (FEI) health, safety and radiological training and oversee the PRPs' proposed Gamma Cone Penetrometer Test (GCPT) radiological sampling operations at the Westlake Landfill Site. I arrived on site at 0700 hours on Monday, October 28, 2013, and discussed training, site operations and planned activities with Daniel Feezor, (owner Feezor Engineering, Inc. [FEI]). FEI is performing the GCPT work on behalf of the PRPs, which includes clearing, establishing the road system within OU-1, the radiologically impacted area (RIM), and GCPT testing and core sampling.

See the approved GCPT Work Plan, Revision 2, dated September 27, 2013, for an overview of the proposed work and procedures.

OSC oversight 10/29 – 11/09/2013:

R7 OSCs were tasked with oversight of the OU-1 RIM area prep and the Gamma Cone Penetrometer testing (GCPT) and core sampling phases. I was on-site to monitor the initial vegetation clearing in preparation for the construction of the "main line alignment" sampling gravel pathways or OU-1 RIM prep work. This phase included bringing equipment to the site, constructing a storage area, graveling / paving roads into the OU-1 RIM area, brush hogging/vegetation clearing of the site and establishing a decontamination pad. *(It is my understanding that FEI, at this point, is only conducting an engineering survey – there will be no isolation barrier construction or excavation in this phase. The purpose of the work is to survey an area between Bridgeton Sanitary Landfill and West Lake Landfill, at and below the ground's surface, using drilling and*

scanning equipment, to identify any radiologically-impacted material that may be present and ensure the area is suitable for future construction of the isolation barrier.)

I observed FEI building a system of temporary roads or paths across a portion of the RIM surface, on which the survey equipment (GCPT vehicle) will be able to travel. This was done to avoid unnecessary disturbance of the landfill's surface. During the clearing phase, the equipment and techniques being used for this survey were expected to generate only minimal amounts of dust. EPA staff was on-site monitoring all work to ensure that any dust generated was suppressed by means of wetting of surfaces with water.

During this phase, I did not observe any visible emissions or fugitive dust leaving the site. I observed the work being conducted during this time period. This work included construction of the main alignment pathway; development of pathways #1- #12, the "finger pathways" off of the main alignment; hauling; excavating; personal & equipment decontamination being performed in accordance with procedures & protocols; performance of daily work assignments, and attendance at daily site safety briefings. During this time period, the site experienced one half day of work in the morning and was rained out all afternoon (10/29/13), two rain outs (10/31 & 11/6/2013) where no work was undertaken and one rain delay (11/5/2013) where work commenced all day but efforts were hampered due to wet weather conditions.

The Missouri Department of Natural Resources (MDNR) staff was occasionally on-site (Shaun Muenks & Rita Alexander) and continued to monitor the air for gamma radiation and other emissions throughout this initial phase. Also, all personnel (contractor, State, Federal, & local) working on the project were trained in appropriate worker health and safety protocols for the site, and followed their respective written Health and Safety Plans. I observed FEI conducting daily site safety, radiological work permit procedures and scope of work briefings and documentation.

To my knowledge, the site was not visited by the general public or any media outlets during this time period.

All site photographs, drawings, records, and / or other actions taken that document EPA OSC oversight or PRP actions can be found at: www.epaosc.org/westlakeoversightinfo.